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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,  
v.  
Petitioner,  
ELI CHABOT AND RENEE CHABOT,  
Respondents.

Civil Action No. 3:14-cv-03055 (FLW)(DEA)

**NOTICE OF CROSS-MOTION**

TO: Ward W. Benson, Esq.  
Trial Attorney, Tax Division  
U. S. Department of Justice  
P.O. Box 227  
Ben Franklin Station  
Washington, DC 20044

**PLEASE TAKE NOTICE** that on March 7, 2016, at 10:00 a.m. or as soon thereafter as  
counsel may be heard, Rivkin Radler, LLP, counsel for Respondents, Eli Chabot and Renee

Chabot (collectively “Respondents”) will move before the Hon. Freda L. Wilson, U.S.D.J., at the United States Court, Clarkson S. Fisher Federal Building, 402 East State Street, Room 5050, Trenton, New Jersey 08608 for an Order compelling the Petitioner to turn over to Respondents’ counsel within ten (10) days of the Court’s Order (i) all documents which the Government claims suggest that Eli Chabot and/or Renee Chabot has (or ever had) a foreign bank account, including, but not limited to, all such documents referred to by Revenue Agent Angelina Grasty in paragraph 4 of her Declaration dated December 21, 2015; and (ii) all documents the Internal Revenue Service or other government agency or department has relating to any account or accounts in the name of Pelsa Business, Inc., including, but not limited to, all account opening documents, all signature cards, all documents relating to any such account or accounts that bear the signature of any person or persons, and all correspondence between the bank at which Pelsa Business, Inc. maintained an account or accounts and any other person, which correspondence relates to such account or accounts;

**PLEASE TAKE FURTHER NOTICE** that in support of the within application, the undersigned shall rely upon the accompanying Declaration of Richard A. Levine, Esq. and accompanying Memorandum of Law;

**PLEASE TAKE FURTHER NOTICE** that a proposed form of order is also submitted herewith for the Court’s consideration.

Dated: February 22, 2016

**RIVKIN RADLER LLP**  
*Attorneys for Respondents,*  
*Eli Chabot and Renee Chabot*

By: /s/ Frank Holahan  
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